

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

Gregory A. Miller, M.D.,

*Plaintiff,*

v.

MagMutual Insurance Company,

*Defendant.*

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**C/A No.: 0:24-cv-1212-SAL**

**EXHIBIT 1 TO RESPONSE TO MOTION  
TO DISMISS AND STAY**

**Affidavit of Harry Goldberg, Esquire**

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ROCK HILL DIVISION

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Gregory A. Miller, M.D.,	)	C/A No.: 0:24-cv-1212-SAL
	)	
Plaintiff,	)	
	)	
vs.	)	AFFIDAVIT
	)	
MagMutual Insurance Company,	)	
	)	
Defendant.	)	

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Personally appeared before me, Harry L. Goldberg, who first being duly sworn, deposes and says that:

I am co-counsel for Dr. Gregory A. Miller in C/A No. 0:24-CV-1212-SAL which is pending in the United States District Court, District of South Carolina, Rock Hill Division.

I am also representing Dr. Miller in connection with post-judgment matters related to the case of Patton v. Dr. Gregory A. Miller which was originally brought in the Court of Common Pleas of York County. A judgment was entered against Dr. Miller in that case. An appeal by Dr. Miller is now pending before the S.C. Court of Appeals.

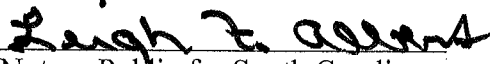
I have been informed by counsel for Patton, Ed Graham, Esquire, that he intends to pursue post-judgment supplemental proceedings against Dr. Miller in an effort to collect on the judgment which plaintiff obtained in the Patton case. In that regard, Mr. Graham has requested that I provide him with a date wherein he can depose Dr. Miller as to his personal assets. The deposition is presently scheduled for July 16, 2024.

Further deponent sayeth not.

  
\_\_\_\_\_  
Harry L. Goldberg

Sworn to before me this

12 day of June, 2024

  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires: 3/11/26